IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re Application of:	) Examiner: Nguyen, Huy Thanh
	)
Hawley K Rising, et al.	) Art Unit: 2621
	)
Application No. 10/005,252	) Confirmation No.: 9370
	)
Filed: December 3, 2001	)
	)
For: Distributed Semantic	)
Descriptions Of Audiovisual	)
Content	)

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Commissioner for Patents
P.O. Box 1450
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APPEAL BRIEF UNDER 37 C.F.R. § 41.37

This is an appeal to the Board of Patent Appeals and Interferences from the

decision of the Examiner of Group 2621, mailed November 24, 2009, in which claims

1-41 in the above-identified application were rejected in a final action. This Appeal Brief

is hereby submitted pursuant to 37 C.F.R. § 41.37(a).

I. REAL PARTY IN INTEREST

The real parties in interest are the co-assignees of the full interest in the invention:

Sony Electronics, Inc. of Park Ridge, New Jersey, and Sony Corporation of Tokyo,

Japan.

II. RELATED APPEALS AND INTERFERENCES

To the best of Appellant's knowledge, there are no appeals or interferences related to the present appeal that will directly affect, be directly affected by, or have a bearing on the Board's decision in the instant appeal.

III. STATUS OF THE CLAIMS

Claims 1-16 and 18-41 are pending in the application and were finally rejected in an Office Action mailed on November 24, 2009. Claims 1-16 and 18-41 are the subject of this appeal. A copy of claims 1-16 and 18-41 as they stand on appeal are set forth in the Claims Appendix.

IV. STATUS OF AMENDMENTS

No amendments to the claims have been made after receipt of the Office Action.

V. SUMMARY OF CLAIMED SUBJECT MATTER

Appellant's invention as claimed in claims 1-16 and 18-41 is directed to creating descriptions of audiovisual content [Specification, page 10, lines 8-9].

Independent method claim 1 claims creating a first description that describes a concept depicted in an existing audiovisual content [Specification, page 17, lines 7-8]. In addition, independent claim 1 claims defining, by the processor, reuse information pertaining to reuse of the first description, the reuse information indicating a type of reuse that is allowed [Specification, page 17, line 22 - page 18, line 1]. Furthermore, independent claim 1 claims storing the first description and the reuse information in a

repository of descriptive data to enable subsequent reuse of the first description, in accordance with the reuse information [Specification, page 18, lines 13-15]. Independent claim 1 additionally claims the first description and the reuse information are used to create a second description that describes a similar concept depicted in a new audiovisual content that is different than the existing audiovisual content [Specification, page 18, lines 21-23]. Furthermore, independent claim 1 claims the second description includes a reference to the first description that is to be reused [Specification, page 19, lines 19-21].

Independent method claim 9 claims finding existing descriptive data that describes a concept depicted in an existing audiovisual data that is similar to a concept depicted in a new audiovisual content that is different than the existing audiovisual content [Specification, page 19, lines 2-6]. In addition, independent claim 9 claims analyzing reuse information associated with the descriptive data, the reuse information indicating a type of reuse that is allowed [Specification, page 19, lines 14-18]. Furthermore, independent claim 9 claims creating, by the processor in accordance with the associated reuse information, a new description for the new audiovisual content using the existing descriptive data and the associated reuse information, wherein the new description includes a reference to the existing descriptive data that is to be reused [Specification, page 19, lines 19-21].

Independent method claim 21 claims creating a first description that describes a concept depicted in an existing audiovisual content [Specification, page 23, lines 2-3]. In addition, independent claim 21 claims defining reuse information associated with the first description, the reuse information indicating a type of reuse that is allowed [Specification, page 23, lines 3-4]. Independent claim 21 further claims reusing the first

description, by the processor, to create a second description that describes a similar concept depicted in a modified audiovisual content in accordance with the reuse information, the reuse being performed concurrently with creation of the modified audiovisual content, wherein the modified audiovisual content is different than the existing audiovisual content [Specification, page 23, lines 7-10]. In addition, claim 21 claims the second description includes a reference to the first description that is to be reused [Specification, page 19, lines 19-21].

Claim 22 is a claim under 35 U.S.C. § 112, 6th paragraph. Independent system claim 22 claims means for creating a first description that describes a concept depicted in existing audiovisual content, the means for creating including a processor [Specification, page 16, lines 19-21]. The corresponding structure for the means for creating is the description processor 108 shown in Figure 4. Independent system claim 22 additionally claims means for defining reuse information pertaining to reuse of the first description, the reuse information indicating a type of reuse that is allowed [Specification, page 16, lines 21-22, page 17, lines 1-5]. The corresponding structure for the means for defining is the reuse information creator 110 shown in Figure 4. Furthermore, independent system claim 22 claims means for storing the first description and the reuse information in a repository of descriptive data to enable subsequent reuse of the first description [Specification, page 15, lines 17-20]. Moreover, independent system claim 22 claims the means for storing are used to create, in accordance with the reuse information, a second description that describes a similar concept depicted in a new audiovisual content that is different than the existing audiovisual content [Specification, page 16, lines 10-13]. In addition, independent system claim 22 claims that the second description includes a

reference to the first description that is to be reused [Specification, page 19, lines 19-21]. The corresponding structure for the means for storing is the data repository 104 shown in Figure 4.

Independent apparatus claim 23 claims a description processor to create a first description that describes a concept depicted in an existing audiovisual content [Specification, page 16, lines 19-21]. Independent claim 23 further claims a reuse information creator to define reuse information pertaining to reuse of the first description [Specification, page 16, lines 21-22]. Independent claim 23 additionally claims the reuse information indicating a type of reuse that is allowed [Specification, page 17, lines 1-5]. In addition, independent claim 23 claims a repository of descriptive data to store the first description and the reuse information to enable subsequent reuse of the first description, in accordance with the reuse information [Specification, page 15, lines 17-20]. Furthermore, independent claim 23 claims the repository of descriptive data is used to create a second description that describes a similar concept depicted in a new audiovisual content that is different than the existing audiovisual content [Specification, page 16, lines 10-13]. Moreover, independent claim 23 claims the second description includes a reference to the first description that is to be reused [Specification, page 19, lines 19-21].

Claim 30 is a claim under 35 U.S.C. § 112, 6th paragraph. Independent system claim 30 claims means for finding existing descriptive data that describes a concept depicted in an existing audiovisual data that is similar to a concept depicted in a new audiovisual content that is different than the existing audiovisual content [Specification, page 16, lines 10-16]. The corresponding structure for the means for finding is the reuse module 106 shown in Figure 4. In addition, independent system claim 30 claims means

for analyzing reuse information associated with the descriptive data, the reuse information indicating a type of reuse that is allowed [Specification, page 16, lines 16-18]. The corresponding structure for the means for analyzing is the reuse module 106 shown in Figure 4. Furthermore, independent system claim 30 claims means for creating, in accordance with the reuse information, a new description for the new audiovisual content using the existing descriptive data and the associated reuse information [Specification, page 16, lines 19-21]. Independent system claim 30 further claims the new description including a reference to the existing descriptive data that is to be reused, the means for creating including a processor [Specification, page 16 line 21-page 17, line 5]. The corresponding structure for the means for creating is the description processor 108 shown in Figure 4.

Independent apparatus claim 31 claims a reuse module to find existing descriptive data that describes a concept depicted in an existing audiovisual data that is similar to a concept depicted in a new audiovisual content that is different than the existing audiovisual content [Specification, page 16, lines 10-16; reuse module 106 of Figure 4]. Independent apparatus claim 31 further claims the reuse module to analyze reuse information associated with the descriptive data, the reuse information indicating a type of reuse that is allowed [Specification, page 16, paragraph 16-18; reuse module 106 of Figure 4]. Independent apparatus claim 31 additionally claims a description processor to create, in accordance with the associated reuse information, a new description for the new audiovisual content using the existing descriptive data and the associated reuse information, the new description including a reference to the existing descriptive data that is to be reused [Specification, page 16, lines 19-21; description processor 108 of

Figure 4].

Claim 37 is a claim under 35 U.S.C. § 112, 6th paragraph. Independent system 37 claims means for creating a first description that describes a concept depicted in an existing audiovisual content, the means for creating including a processor [Specification, page 16, lines 19-21]. The corresponding structure for the means for creating is description processor 108 shown in Figure 4. Furthermore, independent system claim 37 claims means for defining reuse information associated with the first description, the reuse information indicating a type of reuse that is allowed [Specification, page 16, line 21-page 17, line 5; reuse information creator 110 of Figure 4]. In addition, independent system claim 37 claims means for reusing the first description, in accordance with the reuse information, to create a second description that describes a similar concept depicted in a modified audiovisual content in accordance with the reuse information [Specification, page 16, lines 10-16; reuse module 106 of Figure 4], the reuse being performed concurrently with creation of the modified audiovisual content, wherein the modified audiovisual content is different than the existing audiovisual content, wherein the second description includes a reference to the first description that is to be reused [Specification, page 23, lines 7-10].

Independent apparatus claim 38 claims a description processor to create a first description that describes a concept depicted in an existing audiovisual content [Specification, page 16, lines 19-21; description processor 108 of Figure 4]. Independent apparatus claim 38 additionally claims a reuse information creator to define reuse information associated with the first description, the reuse information indicating a type of reuse that is allowed [Specification, page 16, line 21- page 17, line 5]. Independent

apparatus claim 38 further claims the description processor to reuse the first description, in accordance with the reuse information, to create a second description that describes a similar concept depicted in a modified audiovisual content in accordance with the reuse information, wherein the modified audiovisual content is different than the existing audiovisual content, wherein the second description includes a reference to the first description that is to be reused [Specification, page 16, line 19-page 17, line 5]. In addition, independent claim 38 claims the reuse being performed concurrently with creation of the modified audiovisual content [Specification, page 23, lines 7-10].

Independent machine-readable storage medium claim 39 claim encoding computer program instructions, which when executed on a processor, cause a processor to perform operations [Specification, page 26, lines 1-12; instructions 926 in main memory 904 of Figure 9]. Independent claim 39 also claims creating a first description that describes a concept depicted in an existing audiovisual content [Specification, page 17, lines 7-10]. Independent claim 39 further claims defining reuse information pertaining to reuse of the first description, the reuse information indicating a type of reuse that is allowed [Specification, page 17, lines 22-page 18, line 1]. Moreover, independent claim 39 claims storing the first description and the information pertaining to reuse of the first description in a repository of descriptive data to enable subsequent reuse of the first description, in accordance with the reuse information, to create a second description of a similar concept depicted in a new audiovisual content that is different than the existing audiovisual content, wherein the second description includes a reference to the first description that is to be reused [Specification, page 18, lines 13-23].

Independent machine-readable storage medium claim 40 claim encoding computer program instructions, which when executed on a processor, cause a processor to perform operations [Specification, page 26, lines 1-12]. Independent claim 40 also claims finding existing descriptive data that describes a concept depicted in an existing audiovisual data that is similar to a concept depicted in a new audiovisual content that is different than the existing audiovisual data [Specification, page 19, lines 2-6]. Independent claim 40 further claims analyzing reuse information associated with the descriptive data, the reuse information indicating a type of reuse that is allowed [Specification, page 19, lines 14-18]. Claim 40 further claims creating, in accordance with the associated reuse information, a new description for the new audiovisual content using the existing descriptive data and the associated reuse information, the second description including a reference to the first description that is to be reused [Specification, page 19-20, 19-23].

Independent machine-readable storage medium claim 41 claim encoding computer program instructions, which when executed on a processor, cause a processor to perform operations [Specification, page 26, lines 1-12]. Independent claim 41 also claims creating a first description that describes a concept depicted in an existing audiovisual content [Specification, page 23, lines 2-3]. In addition, independent claim 41 claims defining reuse information associated with the first description, the reuse information indicating a type of reuse that is allowed [Specification, page 23, lines 3-4]. Furthermore, independent claim 41 claims reusing the first description, in accordance with the reuse information, to create a second description that describes a similar concept depicted in a modified audiovisual content in accordance with the reuse information, the

reuse being performed concurrently with creation of the modified audiovisual content, wherein the modified audiovisual content is different than the existing audiovisual content, wherein the second description includes a reference to the first description that is to be reused [Specification, page 23, lines 7-10].

VI. GROUNDS OF REJECTION TO BE REVIEWED ON APPEAL

I.   Claims 1-15, 17, 20-34, and 37-41 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Crawford et al., U.S. Patent No. 5,805,784 in view of Etra et al., U.S. Patent No. 5,012,334, and Sezan et al., U.S. Patent No. 7,509,580.

II.   Claims 16, 18-19, and 35-36 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Crawford et al., U.S. Patent No. 5,805,784 in view of Etra et al., U.S. Patent No. 5,012,334, Sezan et al., U.S. Patent No. 7,509,580, and further in view of Official Notice.

VII. ARGUMENTS

I.   Claims 1-15, 17, 20-34, and 37-41 are Patentable under 35 U.S.C. § 103(a) over the combination of Crawford, Etra, and Sezan because the combination of Crawford, Etra, and Sezan does not teach or suggest all elements in the claims.

Claims 1-15, 17, 20-34, and 37-41 stand or fall together. Independent claim 1 is the representative claim.

Crawford discloses an entertainment system that generates an audiovisual program, such as a video game, from a matrix of reusable story fragment (substories). A

substory which is to be performed in the future is stored in a set of slots and includes an indicator for which previous event, if any, was the cause of the planned event.

Etra discloses an image data bank of reusable image sequences (stock footage). A producer searches through the data bank for a certain image sequence for a new script, which he/she tags with a keyword. When the same producer next specifies that same keyword, the tagged image sequence is retrieved. Etra also discloses a data index and an edit list associated with the tagged image sequences.

Sezan discloses a method of recording and presenting audio and video information to a user using description schemes. A separate description scheme is defined for each portion of the audiovisual presentation system – program(s), user, and system. A description scheme for a portion defines the functionality of that portion and the interrelationship of that portion to the other portions.

In independent claim 1, Appellant claims a first description that describes a concept depicted in an existing audiovisual content and reuse of the first description, in accordance with the reuse information, to create a second description that describes a similar concept depicted in a new audiovisual content that is different than the existing audiovisual content, wherein the second description includes a reference to the first description that is to be reused.

The Examiner equates Appellant's claimed first description with Crawford's substories. Appellant respectfully submits that Crawford's substories cannot be properly considered equivalent to Appellant's first description as claimed. Crawford's substories include story fragments, which are the audiovisual content itself. In contrast, Appellant's first description describes a concept depicted in an existing audiovisual content, rather

than simply the audiovisual content. Therefore, Appellant respectfully submits that the substories of Crawford cannot be properly interpreted as equal to Appellant's claimed first description.

The Examiner asserts that Crawford et al. as modified by Etra et al. discloses reuse of the first description, in accordance with the reuse information, to create a second description that describes a similar concept depicted in a new audiovisual content that is different than the existing audiovisual content, wherein the second description includes a reference to the first description that is to be reused. Crawford's substories as modified with Etra's tagged image sequence cannot be properly considered equivalent to the reuse of the first description to create a second description as claimed. Modifying Crawford with Etra at best teaches reusing a substory search result for a keyword by tagging story fragments returned by a keyword search with the keyword. In contrast, Appellant's first description is reused, in accordance with reuse information, to create a second description that describes a similar concept depicted in a new audiovisual content that is different than the existing audiovisual content, wherein the second description includes a reference to the first description that is to be reused.

Therefore, Appellant respectfully submits that the combination of Crawford, Etra, and Sezan does not teach or suggest a first description that describes a concept depicted in an existing audiovisual content and reuse of the first description, in accordance with the reuse information, to create a second description that describes a similar concept depicted in a new audiovisual content that is different than the existing audiovisual content, wherein the second description includes a reference to the first description that is to be reused as claimed. Accordingly, Appellant respectfully submits that the

combination of Crawford, Etra, and Sezan cannot be properly interpreting as making Appellant's independent claim 1 unpatentable.

II.   Claims 16, 18-19, and 35-36 are Patentable under 35 U.S.C. § 103(a) over the combination of Crawford, Etra, Sezan, and Official Notice, because the combination of Crawford, Etra, Sezan, and Official Notice does not teach or suggest all elements in the claims.

A. Claims 16, 18-19, and 35-36 stand or fall together. Claims 16, 18-19, and 35-36 depend on independent claims 9 and 31. Independent claims 9 and 31 include similar elements as independent claim 1. Independent claim 1 is the representative claim.

As discussed above with regard to claim 1, none of Crawford, Etra, or Sezan teaches or suggests a first description as claimed or reuse of a first description to create a second description as claimed. The Examiner takes Official Notice that it would have been obvious to one of ordinary skill in the art to modify Crawford to use dictionary mappings, graph operations, and object-oriented inheritance graphs. However, the Official Notice does not teach or suggest the elements of independent claim 1 which are missing from Crawford, Etra, and Sezan. Accordingly, Appellant respectfully submits that the combination of Crawford, Etra, Sezan, and Official Notice cannot be properly interpreting as making Appellant's independent claim 1 unpatentable.

VIII. CONCLUSION

Appellant's claims 1-15, 17, 20-34, and 37-41 are patentable because the combination of Crawford, Etra, and Sezan does not teach or suggest all elements in the

claims 1-15, 17, 20-34, and 37-41. Appellant's claims 16, 18-19, and 35-36 are patentable because the combination of Crawford, Etra, Sezan, and the AAPA does not teach or suggest all elements in the claims 16, 18-19, and 35-36. Accordingly, Appellant respectfully requests the Board reverse the rejections of claims 1-16 and 18-41 under 35 U.S.C. § 103(a), and direct the Examiner to enter a Notice of Allowance for claims 1-16 and 18-41.

Fee for Filing a Brief in Support of Appeal

Enclosed is a check in the amount of $510.00 to cover the fee for filing a brief in support of an appeal as required under 37 C.F.R. §§ 1.17(c) and 41.37(a).

Deposit Account Authorization

Authorization is hereby given to charge our Deposit Account No. 02-2666 for any charges that may be due. Furthermore, if an extension is required, then Appellant hereby requests such extension.

Respectfully submitted,

BLAKELY, SOKOLOFF, TAYLOR
& ZAFMAN LLP

Dated: April 29, 2010

Simona Freeman
Attorney for Appellant
Registration No. 63,901

1279 Oakmead Parkway
Sunnyvale, CA 94085-4040
(408) 720-8300

CLAIMS APPENDIX

1. (Previously Presented) A method of execution by a processor for processing descriptions of audiovisual content, the method comprising:

creating a first description that describes a concept depicted in an existing audiovisual content;

defining, by the processor, reuse information pertaining to reuse of the first description, the reuse information indicating a type of reuse that is allowed; and

storing the first description and the reuse information in a repository of descriptive data to enable subsequent reuse of the first description, in accordance with the reuse information, to create a second description that describes a similar concept depicted in a new audiovisual content that is different than the existing audiovisual content, wherein the second description includes a reference to the first description that is to be reused.

2. (Original) The method of claim 1 wherein the first description is a semantic description.

3. (Original) The method of claim 1 wherein the first description is a description scheme.

4. (Previously Presented) The method of claim 1 wherein the reuse information indicates whether the first description can be embedded into the second description without changing an intended meaning of the first description.

5. (Previously Presented) The method of claim 1 wherein the reuse information indicates whether the first description can be divided into a plurality of partial descriptions, each of the plurality of partial descriptions being suitable for subsequent reuse.

6. (Previously Presented) The method of claim 1 wherein the reuse information indicates whether the first description can be transformed when reused to create the second description.

7. (Previously Presented) The method of claim 1 wherein the reuse information indicates whether the first description can maintain transitive capability when the first description is reused to create the second description.

8. (Original) The method of claim 1 further comprising:

reusing a plurality of descriptions stored in one or more repositories of descriptive data a number of times to provide de facto standardization of the plurality of descriptions by category.

9. (Previously Presented) A method of execution by a processor for reusing descriptions of audiovisual content, the method comprising:

finding existing descriptive data that describes a concept depicted in an existing audiovisual data that is similar to a concept depicted in a new audiovisual content that is different than the existing audiovisual content;

analyzing reuse information associated with the descriptive data, the reuse information indicating a type of reuse that is allowed; and

creating, by the processor in accordance with the associated reuse information, a new description for the new audiovisual content using the existing descriptive data and the associated reuse information, wherein the new description includes a reference to the existing descriptive data that is to be reused.

10. (Original) The method of claim 9 wherein the new description is a semantic description.

11. (Original) The method of claim 9 wherein the new description is a description scheme.

12. (Original) The method of claim 9 wherein the descriptive data is at least a portion of one or more existing descriptions of audiovisual content.

13. (Original) The method of claim 9 further comprising:

retrieving the descriptive data from one or more repositories of descriptive data.

14. (Original) The method of claim 9 wherein creating the new description further comprises:

converting the existing descriptive data into a partial description; and

mapping the partial description to the new description.

15. (Original) The method of claim 9 wherein creating the new description further comprises:

accessing a portion of the existing descriptive data in a repository of descriptive data; and

mapping the portion of the existing descriptive data to the new description.

16. (Original) The method of claim 9 wherein creating the new description further comprises:

performing dictionary mapping of objects in the existing descriptive data to corresponding objects in the new description.

17. (Canceled)

18. (Original) The method of claim 9 wherein the new description is created using a mechanism for performing graph operations.

19. (Original) The method of claim 9 wherein the new description is created using an object oriented inheritance mechanism.

20. (Original) The method of claim 9 wherein creating the new description further comprises:

extracting the existing descriptive data from a semantic mosaic that integrates a plurality of related descriptions.

21. (Previously Presented) A method for dynamically reusing descriptions of audiovisual content, the method comprising:

creating a first description that describes a concept depicted in an existing audiovisual content;

defining reuse information associated with the first description, the reuse information indicating a type of reuse that is allowed; and

reusing the first description, by the processor, to create a second description that describes a similar concept depicted in a modified audiovisual content in accordance with the reuse information, the reuse being performed concurrently with creation of the modified audiovisual content, wherein the modified audiovisual content is different than the existing audiovisual content, wherein the second description includes a reference to the first description that is to be reused.

22. (Previously Presented) A system for processing descriptions of audiovisual content, the system comprising:

means for creating a first description that describes a concept depicted in existing audiovisual content, the means for creating including a processor;

means for defining reuse information pertaining to reuse of the first description, the reuse information indicating a type of reuse that is allowed; and

means for storing the first description and the reuse information in a repository of descriptive data to enable subsequent reuse of the first description to create, in accordance with the reuse information, a second description that describes a similar concept depicted in a new audiovisual content that is different than the existing audiovisual content, wherein the second description includes a reference to the first description that is to be reused.

23. (Previously Presented) An apparatus comprising:

a description processor to create a first description that describes a concept depicted in an existing audiovisual content;

a reuse information creator to define reuse information pertaining to reuse of the first description, the reuse information indicating a type of reuse that is allowed; and

a repository of descriptive data to store the first description and the reuse information to enable subsequent reuse of the first description, in accordance with the reuse information, to create a second description that describes a similar concept depicted in a new audiovisual content that is different than the existing audiovisual content, wherein the second description includes a reference to the first description that is to be reused.

24. (Original) The apparatus of claim 23 wherein the first description is a semantic description.

25. (Original) The apparatus of claim 23 wherein the first description is a description scheme.

26. (Previously Presented) The apparatus of claim 23 wherein the reuse information indicates whether the first description can be embedded into a second description of audiovisual content without changing an intended meaning of the first description.

27. (Previously Presented) The apparatus of claim 23 wherein the reuse information indicates whether the first description can be divided into a plurality of partial descriptions, each of the plurality of partial descriptions being suitable for subsequent reuse.

28. (Previously Presented) The apparatus of claim 23 wherein the reuse information indicates whether the first description can be transformed when reused to create a second description of audiovisual content.

29. (Previously Presented) The apparatus of claim 23 wherein the reuse information indicates whether the first description can maintain transitive capability if the first description is reused to create a second description of audiovisual content.

30. (Previously Presented) A system for reusing descriptions of audiovisual content, the system comprising:

      means for finding existing descriptive data that describes a concept depicted in an existing audiovisual data that is similar to a concept depicted in a new audiovisual content that is different than the existing audiovisual content;

      means for analyzing reuse information associated with the descriptive data, the reuse information indicating a type of reuse that is allowed; and

      means for creating, in accordance with the reuse information, a new description for the new audiovisual content using the existing descriptive data and the associated reuse information, the new description including a reference to the existing descriptive data that is to be reused, the means for creating including a processor.

31. (Previously Presented) An apparatus comprising:

      a reuse module to find existing descriptive data that describes a concept depicted in an existing audiovisual data that is similar to a concept depicted in a new audiovisual content that is different than the existing audiovisual content, and to analyze reuse information associated with the descriptive data, the reuse information indicating a type of reuse that is allowed; and

      a description processor to create, in accordance with the associated reuse information, a new description for the new audiovisual content using the existing descriptive data and the associated reuse information, the new description including a reference to the existing descriptive data that is to be reused.

32. (Original) The apparatus of claim 31 wherein the new description is a semantic description.

33. (Original) The apparatus of claim 31 wherein the new description is a description scheme.

34. (Original) The apparatus of claim 31 wherein the descriptive data is at least a portion of one or more existing descriptions of audiovisual content.

35. (Original) The apparatus of claim 31 wherein the new description is created using a mechanism for performing graph operations.

36. (Original) The apparatus of claim 31 wherein the new description is created using an object oriented inheritance mechanism.

37. (Previously Presented) A system for dynamically reusing descriptions of audiovisual content, the method comprising:

  means for creating a first description that describes a concept depicted in an existing audiovisual content, the means for creating including a processor;

  means for defining reuse information associated with the first description, the reuse information indicating a type of reuse that is allowed; and

means for reusing the first description, in accordance with the reuse information, to create a second description that describes a similar concept depicted in a modified audiovisual content in accordance with the reuse information, the reuse being performed concurrently with creation of the modified audiovisual content, wherein the modified audiovisual content is different than the existing audiovisual content, wherein the second description includes a reference to the first description that is to be reused.

38. (Previously Presented) An apparatus comprising:

a description processor to create a first description that describes a concept depicted in an existing audiovisual content; and

a reuse information creator to define reuse information associated with the first description, the reuse information indicating a type of reuse that is allowed, the description processor to reuse the first description, in accordance with the reuse information, to create a second description that describes a similar concept depicted in a modified audiovisual content in accordance with the reuse information, the reuse being performed concurrently with creation of the modified audiovisual content, wherein the modified audiovisual content is different than the existing audiovisual content, wherein the second description includes a reference to the first description that is to be reused.

39. (Previously Presented) A computer readable storage medium encoded with computer program instructions, which when executed on a processor, cause said processor to perform operations comprising:

creating a first description that describes a concept depicted in an existing audiovisual content;

defining reuse information pertaining to reuse of the first description, the reuse information indicating a type of reuse that is allowed; and

storing the first description and the information pertaining to reuse of the first description in a repository of descriptive data to enable subsequent reuse of the first description, in accordance with the reuse information, to create a second description of a similar concept depicted in a new audiovisual content that is different than the existing audiovisual content, wherein the second description includes a reference to the first description that is to be reused.

40. (Previously Presented) A computer readable storage medium encoded with computer program instructions, which when executed on a processor, cause said processor to perform operations comprising:

finding existing descriptive data that describes a concept depicted in an existing audiovisual data that is similar to a concept depicted in a new audiovisual content that is different than the existing audiovisual data;

analyzing reuse information associated with the descriptive data, the reuse information indicating a type of reuse that is allowed; and

creating, in accordance with the associated reuse information, a new description for the new audiovisual content using the existing descriptive data and the associated reuse information, the second description including a reference to the first description that is to be reused.

41. (Previously Presented) A computer readable storage medium encoded with computer program instructions, which when executed on a processor, cause said processor to perform operations comprising:

creating a first description that describes a concept depicted in an existing audiovisual content;

defining reuse information associated with the first description, the reuse information indicating a type of reuse that is allowed; and

reusing the first description, in accordance with the reuse information, to create a second description that describes a similar concept depicted in a modified audiovisual content in accordance with the reuse information, the reuse being performed concurrently with creation of the modified audiovisual content, wherein the modified audiovisual content is different than the existing audiovisual content, wherein the second description includes a reference to the first description that is to be reused.

EVIDENCE APPENDIX

NONE.

RELATED PROCEEDINGS APPENDIX

NONE.